

Gene P.



October 18, 1999

Mr. Kenneth J. McKeveny, CHMM
Permitting and Regulatory Compliance Manager
Qualex, Inc.
4020 Stirrup Creek Drive-Suite 211
Durham, NC 27703
Re: Walgreen's #5286-1930 W. Grand

Dar Mr. McKeveny:

I have reviewed the information that you submitted earlier regarding photographic processing wastewater disposal to the Springfield, Mo. POTW. All process wastewater must comply with Chapter 30 of the Springfield City Code, Wastewater Regulations. The Springfield POTW does not have a specific local discharge limitation for silver at this time. Assessment of the need to adjust or evaluate local discharge limitations is an ongoing process, however. Your information indicates that a one-hour lab processing 30 rolls of film per day would generate approximately 2.7 gallons of used solutions. Only 1.9 gallons would contain silver. The silver-bearing solutions will be treated with a silver recovery unit utilizing two metallic replacement cartridges in series. The average silver concentration of the solution after silver recovery is 1.0 mg/l(end of process). When combined with other wastewater from the facility, the silver concentration is typically below 0.1 mg/l(end of pipe). Your letter indicates that approximately 3 gallons per day from the photoprocessing operation will be discharged. Ongoing operation, maintenance, and monitoring of the silver recovery system is required to maintain optimum performance-based removal efficiency. Based on this information, a Wastewater Contribution Permit will not be required by the Springfield POTW at this time.

Although local wastewater regulations do not currently have a local discharge limitation for silver, we strongly encourage the regulated community to comply with the following protocol. As we discussed, the Silver Council, the Association of Metropolitan Sewerage Agencies (AMSA), the National Association of Photographic Manufacturers, the Photo Marketing Association International, and several national and international corporations prepared and issued recommendations on technology, equipment and management practices for controlling silver discharges from facilities that process photographic materials. These recommendations are known as the **Code of Management Practice (CMP)**, and was used to develop a consensus among the regulated and regulatory communities for controlling silver discharges in a cost-effective and environmentally sound manner. Implementation of the CMP recommendations results in many benefits, including improved selection, operation, maintenance and monitoring of silver recovery and management systems among all types and sizes of photographic processing facilities; an increase in the amount of silver recycled and reused; and a reduction in the amount of silver discharged to sewage treatment plants and the environment. A copy of the CMP may be obtained from the National Association of Photographic Manufacturers, Inc, 550 Mamaroneck

INDUSTRIAL PRETREATMENT PROGRAM

1216 W. Nichols St. ♦ Springfield, Missouri 65802
417-864-1487 ♦ fax: 417-864-1918

DEPARTMENT OF PUBLIC WORKS

840 BOONVILLE AVENUE, P.O. BOX 8368 SPRINGFIELD, MISSOURI 65801-8368
(417) 864-1900

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Avenue, Suite 307, Harrison, NY 10528-1612 or (914) 698-7603 Phone, (914) 698-7609 Fax. If we may be of further assistance or can answer any questions, please do not hesitate to call at 417-864-1487.

Sincerely Yours,

A handwritten signature in cursive script that reads "J. Randall Lyman".

J. Randall Lyman
Pretreatment Coordinator

CC: Marc Thornsberry, P.E., Director of Public Works
Bob Schaefer, P.E., Asst. Director of Public Works
Ed Maltcr, P.E., Supt. of Sanitary Services
Gary Nelms, Assistant City Attorney
Pretreatment Inspectors, Industrial Pretreatment Program
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